18-23538-shl Doc 2668 Filed 02/21/19 Entered 02/21/19 16:08:31 Main Document Pg 1 of 2

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

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In re: Chapter 11

SEARS HOLDINGS CORPORATION, et al.,: Case No. 18-23538

:

Debtors. : (Jointly Administered)

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TRACEE M. BRITTON,

Plaintiff,

v.

SEARS HOLDINGS CORPORATION, et al.,

Defendant.

NOTICE OF MOTION FOR RELIEF FROM THE AUTOMATIC STAY

To: Jaqueline Marcus, Esq.

WEIL, GOTHSCHAL, & MANGES LLP

767 Fifth Avenue

New York, New York 10153

PLEASE TAKE NOTICE that on March 21, 2019 at 10:00 a.m. (prevailing Eastern Time) or soon thereafter as counsel may be heard, the undersigned, attorney for Plaintiff, will move before the United States Bankruptcy Court, Southern District of New York, for an Order for Relief from The Automatic Stay provisions of the U.S. Bankruptcy Code. Reliance shall be placed upon the attached Certification of Counsel. A proposed form of Order is enclosed. Oral argument is not requested unless timely opposition is received.

Date: February 21, 2019

Respectfully submitted,

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